



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

RCH  
F. #2022R01030

*610 Federal Plaza  
Central Islip, New York 11722*

August 22, 2023

By ECF

The Honorable Joanna Seybert  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: United States v. Samuel Miele  
Criminal Docket No. 23-327 (JS)

Dear Judge Seybert:

The government respectfully submits, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, a stipulated protective order that limits the disclosure of certain sensitive material in the above-referenced case. Due to the nature of the conduct at issue in this matter, unrestricted disclosure of certain information could result in the dissemination of the personally identifiable information of third parties and witnesses or information related to ongoing investigations or uncharged individuals. Granting the attached protective order will allow the government to produce these materials expeditiously, without the need for extensive redacting, while addressing the aforementioned concerns, including the concerns of third parties whose personally identifiable information is contained within these materials.

Accordingly, the government and counsel for the defendant have jointly agreed to a stipulated protective order, which is attached hereto. For the foregoing reasons, the government respectfully requests that the Court so-order the attached stipulated protective order.

Respectfully submitted,

BREON PEACE  
United States Attorney  
Eastern District of New York

By: /s/  
Ryan C. Harris  
Anthony Bagnuola  
Laura Zuckerwise  
Assistant U.S. Attorneys  
(718) 254-7000

COREY R. AMUNDSON  
Chief, Public Integrity Section  
U.S. Department of Justice

By: /s/  
Jacob R. Steiner  
John P. Taddei  
Trial Attorneys  
(202) 514-1412

cc: Clerk of the Court (JS) (by ECF)